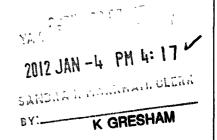
## Office of the Yavapai County Attorney

SHEILA POLK, COUNTY ATTORNEY JEFFREY G. PAUPORE, SBN 007769 STEVEN A. YOUNG, SBN016838 Deputy County Attorney YCAO@co.yavapai.az.us Attorneys for STATE OF ARIZONA



## IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF YAVAPAI

## STATE OF ARIZONA.

Plaintiff,

VS.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

18

19

20

21

22

23

24

25

26

771-3110

Facsimile:

771-3344

Phone: (928) 17 STEVEN CARROLL DEMOCKER,

Defendant.

CAUSE NO. P1300CR201001325

STATE'S REQUEST FOR PHYSICAL **EVIDENCE** 

**EXPEDITED RULING REQUESTED** 

Assigned to Hon. Gary Donahoe

The State of Arizona, by and through undersigned counsel, requests that this Court, pursuant to Rule 15.2(a)(7), Arizona Rules of Criminal Procedure, issue the proposed order for the taking of specimens of the Defendant's handwriting.

There are a number of documents purportedly written and or signed by the Defendant in this case. The State intends to introduce expert testimony, if necessary, to prove that the Defendant wrote and/or signed these documents. Given the Court's recent ruling on the State's Motion Pursuant to Rule 15.3 for Deposition of Witness John Sears, such expert testimony may be necessary to establish foundation for these documents.

WHEREFORE, the State of Arizona respectfully requests that the Court order Defendant to permit the taking of his handwriting specimens by members of the Yavapai County Sheriff' Office, the Yavapai County Attorney's Office and/or the State's handwriting expert, John Hale, at

1	the Yavapai County Jail or Sheriff's Department, at a time to be arranged with such personnel.
2	Such samples will be taken during regular business hours between 8:00 a.m. and 5:00 p.m.,
3	Monday through Friday, and the Defendant's counsel, Craig Williams and Greg Parzych, shall be
4	notified 24 hours in advance of taking of the samples in order to allow them to be present for the
5	taking of the evidence.
6	RESPECTFULLY SUBMITTED this day of January, 2012.
7	
8	Sheila Sullivan Polk YAVAPAI COUNTY ATTORNEY
9	11 19
10	By: XCLEM ( . Gent) Steven A. Young
11	Deputy County Attorney U
12 13	COPY of the foregoing Emailed this day of January, 2012, to:
14	
15	Honorable Gary Donahoe Division 1
16	Yavapai County Superior Court  Via email to gdonahoe1@courts.az.gov
17	And a hardcopy sent to Division 1
18	Craig Williams Attorney for Defendant
19	P.O Box 26692
20	Prescott Valley, AZ 86312 Via email to <u>craigwilliamslaw@gmail.com</u>
21	Greg Parzych
22	Co-counsel for Defendant 2340 W. Ray Rd., Suite #1
23	Chandler, AZ 85224 Via email to: gparzlaw@aol.com
24	THE CO. SPARENCE TO LEAD TO SERVICE TO SERVI
25	20 h